Submittals	517 Citation	Requirements	515 Citation	Differences
Fugitive Dust Control Plan	13-1(b)	control fugitive dust from CCR disposal operations	19-36(c)	Both Chapter 515 and 517 require control of fugitive dust; however, Chapter 517 requires facilities to submit a stand-alone fugitive dust plan. These plans are considered technical plans under OAC 252:4-7-58(3)(D) and processed as Tier I modification applications.
Run-on/Runoff Control System Plan	13-2 (c)	25-year, 24-hour storm - storm water control	17-2	Chapters 515 and 517 both require facilities to be designed, constructed, and maintained with a run-on/runoff control system of the same standards. Chapter 517 requires facilities to prepare a stand-alone run-on/runoff control plan. This plan is considered a technical plan under OAC 252:4-7-58(3)(D) and processed as a Tier I modification application.
Closure Plan	15-7(b)	describe steps necessary to close and cap (or remove CCR from) the unit	25-32	Chapters 515 and 517 both require facilities to develop closure plans to demonstrate how closure will occur in accordance with the applicable closure requirements. There are some differences in the closure requirements between the two chapters, including cover system requirements. However, any necessary changes to closure plans made in accordance with OAC 252:517-1-7(b)(2) were relatively minor, and they were processed as Tier I modifications under OAC 252:4-7-58(2)(a)(iii).
Groundwater Sampling and Analysis Plan	9-4 (a) - (i)	sampling & analysis procedures; analytical methods; groundwater elevations; Establish background water quality; Statistical Methods;	9-3(a)-(e); 9-31; 9-51-54;	Chapters 515 and 517 both include requirements for sampling & analysis procedures, analytical methods, groundwater elevations, establishing background water quality, and identifying statistical methods to be employed in a sampling and analysis plan. Minimal revisions to the groundwater sampling and analysis plans were necessary for purposes of meeting the permit upgrade requirement in OAC 252:517-1-7(b)(2), including the addition of a few constituents not contemplated under Chapter 515. These revisions were processed as Tier I modifications under OAC 252:4-7-58(3)(D).

Groundwater Monitoring Program	9-5 (a)	Identify groundwater monitoring network; Semi-annual monitoring; 8 independent samples from App A & B constituents; Conduct Detection Monitoring program; Evaluate for Statistically Significant Increases.	9-3(b); 9-4; 9-31(d)(3); 9-71(a); 9-74(d)	The groundwater monitoring program requirements in Chapters 515 and 517 are similar. Both include requirements for identifying the groundwater monitoring network, semi-annual monitoring, collecting 8 independent samples for background water quality, conducting detection monitoring program and evaluating compliance wells for statistically significant increases over background. Chapter 515, requires a semi-annual groundwater monitoring report with statistical evaluations be submitted to DEQ; whereas Chapter 517 requires an annual report with statistical analyses of the semi-annual sampling events. Detection monitoring under 517 includes the following constituents: boron, calcium, chloride, fluoride, pH, sulfate, total dissolved solids; detection monitoring of the CCR landfills under Chapter 515 includes: pH, chemical oxygen demand, specific conductivity, chloride, sulfate, calcium, nitrate, carbonate, and potassium plus additional parameters specified in the permit (e.g., arsenic, barium and selenium, among others). These revisions were processed as Tier I modifications under OAC 252:4-7-58(3)(D).

Potential Tiers

Tier	Description	Example
Tier I	Modification to any solid waste permit to make minor changes	Technical plans, administrative approvals, e.g. Fugitive Dust Control Plans, Run-on/Runoff Control System Plans, Closure/post-closure Plans
Tier II	New on-site CCR landfill or impoundment	New, generator owned, facility receiving CCR generated on-site
	Modification in which the request involves different methods, units or appurtenances than those permitted	Change in liner design, change in leachate collection system design, ash processing plans
	General permit modification, not specified as Tier I	Waste boundary expansion, selection of remedy for corrective action, other modifications not specified
Tier III	New off-site CCR landfill or impoundment	New, non-generator owned, facility receiving CCR generated off-site, Big Fork Ranch formerly permitted by Oklahoma Department of mines is an example